

### **REMARKS**

Claims 1-10 are pending in the present application. Claims 1-10 have been rejected. No claims have been amended. Based on the discussion below, it is believed that this application, including claims 1-10, is in condition for allowance.

#### **Claim Rejections 35 U.S.C. § 102**

The Examiner has rejected claims 1, 2, 9, and 10 under 35 U.S.C. § 102(b) as being anticipated by Watanabe (U.S. Patent No. 4,297,838). In particular, the Examiner states that Figure 1 of Watanabe shows a timing motor with a rotor inside the stator plate (5) with a rotor orifice and a plurality of stator poles, where the stator plate has geartrains (3) above and below the stator plate. The Examiner states that Watanabe teaches only one connection of the geartrain through the stator plate. Applicants respectfully disagree with the rejection of claims 1, 2, 9, and 10 as anticipated by Watanabe.

Applicants note that presently amended claim 1 of the present invention recites that the geartrain includes meshing gears and gearshafts positioned on both opposite sides of the stator plate with "at least one gear and/or gearshaft comprising at least two pieces adapted to engage one another during assembly to form a single connection of said geartrain through said stator plate." (Emphasis added.) Referring to Figs. 2A and 2B of the present application, as well as the disclosure at page 23, line 1 through page 24, line 15, it can be seen that the geartrain of the present application

includes a splined shaft (74) and a splined socket (78) on gear (80). The splined shaft and splined socket are adapted to engage one another through the stator plate. The engagement of these two pieces through the stator plate is accomplished during a blind assembly that connects two portions of the geartrain through the stator plate. Thus, one portion of the geartrain can be assembled in one part of the timer housing, and a second portion of the geartrain can be assembled in a second part of the timer housing. When the two housing parts are brought together to complete assembly of the timer, the shaft and socket mate through the stator plate to connect the two portions of the geartrain. This is opposed to prior art assemblies in which gears and/or gearshafts were not in two pieces, and thus the entire geartrain had to be assembled at once.

Applicants submit that Watanabe does not disclose a two-piece single connection of a geartrain through a stator plate, as recited in claim 1. Nowhere does Watanabe disclose that the gear and/or gearshaft in Fig. 1 are two separate pieces, which are connected through the stator plate during assembly of the two subassemblies of the geartrain. In fact, in Fig. 1, the hole through which the gearshaft is disposed is large enough to accommodate the gear and its associated pinion as a single piece. This conforms to the way in which geartrains were assembled in the prior art, as described above.

Thus, Applicants submit that claim 1 is not anticipated by Watanabe, and therefore respectfully request a withdrawal of the rejection of claim 1 over Watanabe.

Applicants further submit that each of claims 2, 9, and 10 ultimately depend from claim

1. Since claim 1 is not anticipated by Watanabe, Applicants respectfully submit that neither are dependent claims 2, 9, and 10 anticipated by Watanabe, and respectfully request a withdrawal of the rejection of claims 2, 9, and 10.

**Claim Rejections 35 U.S.C. § 103**

The Examiner has rejected claims 3-5 under 35 U.S.C. § 103(a) as being unpatentable over Watanabe in further view of Horbach. Applicants respectfully disagree.

In order to establish a prima facie case of obviousness, the Examiner must show that the cited references, as combined, teach or suggest each of the elements of the claims. Claims 3-5 each ultimately depend from independent claim 1, and thus incorporate the limitations of that claim. At least for the reasons discussed above, Watanabe does not teach or suggest each and every element of claim 1. Further, it is submitted that Horbach fails to teach the elements of claim 1 that are missing from Watanabe. More specifically, Applicants submit that, like Watanabe, Horbach does not teach or suggest a geartrain including meshing gears and gearshafts on both opposite sides of the stator plate with "at least one gear and/or gearshaft comprising at least two pieces adapted to engage one another to form a single connection of said geartrain through said stator plate," as presently recited in claim 1. (Emphasis added.) Rather, Horbach is directed to bobbins used in manufacturing electrical coils. Thus, it is

submitted that any combination of Watanabe and Horbach does not show each and every element of claims 3-5, as those claims are ultimately dependent on claim 1.

Accordingly, Applicants respectfully request a reversal of the Examiner's rejection of claims 3-5.

Further, the Examiner has rejected claims 6-8 under 35 U.S.C. § 103(a) as being unpatentable over Watanabe in view of Plancon. Applicants respectfully disagree.

In order to establish a prima facie case of obviousness, the Examiner must show that the cited references, as combined, teach or suggest each of the elements of the claims. Claims 6-8 each ultimately depend from independent claim 1, and thus incorporate the limitations of that claim. At least for the reasons discussed above, Watanabe does not teach or suggest each and every element of claim 1. Further, it is submitted that Plancon fails to teach the elements of claim 1 that are missing from Watanabe. More specifically, Applicants submit that, like Watanabe, Plancon does not teach or suggest a geartrain including meshing gears and gearshafts on both opposite sides of the stator plate with "at least one gear and/or gearshaft comprising at least two pieces adapted to engage one another to form a single connection of said geartrain through said stator plate," as presently recited in claim 1. (Emphasis added.) Rather, while Plancon discloses a stepping motor rotor assembly, it does not disclose a split geartrain engaged in a single connection, having at least two pieces, through the stator

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plate. Thus, it is submitted that any combination of Watanabe and Plancon does not show each and every element of claims 6-8, as those claims are ultimately dependent on claim 1. Accordingly, Appellants respectfully request a reversal of the Examiner's rejection of claims 6-8.

### **Conclusion**

For the foregoing reasons, it is submitted that all claims are patentable, and a Notice of Allowance is respectfully requested.

No fee is believed due as a result of this Response. Any deficiencies or credits necessary to complete this communication should be applied to Deposit Account No. 23-3000.

The Examiner is invited to contact the undersigned attorney with any questions or remaining issues.

Respectfully submitted,  
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